

PDV USA, Inc.

Plaintiff,

v.

Interamerican Consulting, Inc.

Defendant.

No. 20-cv-03699-JGK

**DECLARATION OF DAVID
RIVERA**

DECLARATION OF DAVID RIVERA

I, David Rivera, declare as follows:

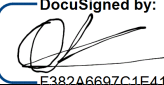
1. I am the President of Interamerican Consulting, Inc. (“Interamerican”) and have personal knowledge of the facts stated herein.
2. Interamerican retained Raul Gorrin of the law firm Gorrin Diaz Perdomo y Asociados to serve as counsel for Interamerican in connection with Consulting Agreement between Interamerican Consulting Inc. and PDV USA, Inc. (the “Contract”).
3. Before, during, and after the term of the Contract, Mr. Gorrin, a Venezuelan attorney, provided legal advice to Interamerican regarding the legal complexities of PDV USA’s relationship to its ultimate parent, PDVSA.
4. This included, among other issues, PDV USA’s proposed assignment of the Contract from PDV USA to PDVSA.
5. In a separate matter, in November 2017, Hugo Perera and myself served as liaisons between Venezuelan attorneys, Raul Gorrin and Jose Simon Elarba, and United States based law firms to assist a Venezuelan national to obtain counsel to represent him in proceedings before a

United States Government Agency. This Venezuelan national was a client of Raul Gorrin and Jose Simon Elarba.

6. My service as a liaison was wholly irrelevant to the Contract, or any of the issues in this litigation.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 6th day of June 2022 in Miami, Florida.

DocuSigned by:

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David Rivera